GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

October 29, 2007

Mr. Richard Hull
EPA Project Coordinator
United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Building 71 On-Plant Consolidation Area (GECD220)
Summary of Fall 2007 Post-Closure Inspection Activities

Dear Mr. Hull:

Consistent with the requirements set forth in Section 9 of the June 1999 *Detailed Work Plan for On-Plant Consolidation Areas* (Detailed Work Plan) for post-closure care, the General Electric Company (GE) conducted a post-closure inspection of the Building 71 On-Plant Consolidation Area (OPCA). The post-closure inspection was performed on GE's behalf by ARCADIS BBL on September 28, 2007 and generally included the final cover area of the Building 71 OPCA and associated components.

Provided below is a description of the inspection activities performed during the Fall 2007 post-closure inspection of the Building 71 OPCA final cover area, as well as a summary of the results of the inspection, including any items identified requiring maintenance. A progress summary of maintenance activities performed subsequent to the Spring 2007 inspection is also provided in the post-closure inspection form (Attachment 1 to this letter).

Inspection Activities

In accordance with Section 9 of the Detailed Work Plan, the Fall 2007 post-closure inspection consisted of visual observations of the Building 71 OPCA final cover and surrounding areas to identify the overall condition of the final cover and associated components, as well as items needing maintenance. The Building 71 OPCA final cover was visually inspected to identify the presence of any of the following conditions, which could affect the overall integrity of the final cover:

- areas void of vegetation or exposed geosynthetic final cover components;
- evidence of erosion or stressed vegetation;
- evidence of burrowing animals;
- apparent surface settlement;
- ponding water conditions;
- undesirable/insufficient vegetative growth;
- undesirable slope conditions (i.e., non-conducive to positive drainage);
- excessive wheel rutting; and
- obstructed drainage features.

In addition to inspecting the final cover, the post-closure inspection included observations of the following associated components:

- paved site access roads;
- the final cover access road;
- surface water drainage system, including the North and South stormwater basins;
- the leachate handling system; and
- perimeter vegetation.

The conditions that were observed for each of these components are listed on the post-closure inspection form.

Inspection Results

The results of the Fall 2007 post-closure inspection were recorded on the post-closure inspection form. The inspection form presents details of the maintenance items identified during the post-closure inspection, as well as proposed repair activities.

In general, the Fall 2007 post-closure inspection indicated that the Building 71 OPCA final cover was in good overall condition and does not require inspection response actions.

Schedule for Future Inspections

In accordance with Section 9 of the Detailed Work Plan, the closed portions of the OPCAs will be inspected approximately every six months to assess the integrity of the final cover and associated components. The next post-closure inspection will be performed in the Spring of 2008 and will include (as appropriate) portions of the Hill 78 final cover. The inspections will continue until GE proposes, and the U.S. Environmental Protection Agency (EPA) approves, a modification or termination of such inspections. Future post-closure inspection reports will also include a progress summary of the maintenance activities identified during the prior inspection period.

Please call me if you have any comments or questions concerning the Fall 2007 post-closure inspection.

Sincerely,

Richard Gates/EGB

Richard Gates
Remediation Project Manager

Attachment

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
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Michael Carroll, GE*
Andrew Silfer, GE
Roderic McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repository

**cover letter only*

Attachments

ARCADIS BBL

Attachment 1

Inspection Form

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
BUILDING 71 ON-PLANT CONSOLIDATION AREA (OPCA)

POST-CLOSURE INSPECTION FORM

I. Inspection Information

Inspection Date:	September 28, 2007 (Friday)	Weather Conditions:	Variable Clouds/48-66 ºF Winds WNW 5-10 MPH
Inspection Area:	Building 71 OPCA Final Cover and ancillary site components		
Performed by:	Robert J. Papallo (ARCADIS-BBL)		
Time Arrived:	9:00 AM	Time Departed:	9:40 AM
Date of Prior Inspection:	June 1, 2007 (Friday)		

II. Observations

	Column A	Column B
A. Site Access Road		
1. Is there excessive cracking, potholes, visible fissures, or spalling?	No	Yes
2. Are the subbase materials exposed in an unsatisfactory manner?	No	Yes
B. Final Cover Access Road		
1. Is there excessive erosion or rutting of road surface?	No	Yes
2. Is there undesirable vegetative growth?	No	Yes
C. Site Security		
1. Are the access gates and locks in operating condition?	Yes	No
2. Is the perimeter fence in satisfactory condition (i.e., in proper position, adequately secured to fence posts, etc.)?	Yes	No
3. Are the posted signs on the perimeter fence securely attached to fence and visible?	Yes	No
D. Final Cover System		
1. Are there bare spots (i.e., areas void of vegetation) or exposed geosynthetic cover components?	No	Yes
2. Is there excessive erosion or stressed vegetation?	No	Yes
3. Is there evidence of burrowing animals?	No	Yes
4. Is there evidence of settlement?	No	Yes
5. Is there evidence of ponding water conditions?	No	Yes
6. Is there sparse or undesirable vegetative growth?	No	Yes
7. Are the slopes adequate for surface water drainage?	Yes	No
8. Is there evidence of excessive wheel rutting?	No	Yes
9. Are cover system drainage layer outlet pipes visible and free of obstructions?	Yes	No
E. Surface Water Drainage System		
1. Does established vegetation provide adequate erosion protection?	Yes	No
2. Are there noticeable obstructions (i.e., sediment accumulation, debris, etc.)?	No	Yes
3. Are there bare spots (i.e., areas void of vegetation) or excessive erosion on stormwater basin berm slopes?	No	Yes
4. Are the stormwater basin inlet and outlet features (i.e., riprap forebay and concrete manhole) functioning and free of excessive sediment and debris buildup?	Yes	No
5. Are the drainage culverts functioning properly (i.e., unobstructed inlet/outlet, pipe ends un-damaged, etc.)?	Yes	No
F. Leachate Handling System		
1. Are the pumps in operating condition?	Yes	No
2. Are the leachate storage tanks in satisfactory condition?	Yes	No
3. Is the leachate collection manhole in satisfactory condition?	Yes	No
4. Are the usable leachate transfer pipes in satisfactory condition?	Yes	No
5. Is the auto dialer warning system in operating condition?	Yes	No
6. Is the flow meter in operating condition?	Yes	No
7. Are the float levels in operating condition?	Yes	No
G. Perimeter Vegetation		
1. Does the vegetation provide for adequate erosion protection?	Yes	No
2. Are there bare spots (i.e., areas void of vegetation) or excessive erosion?	No	Yes
3. Is there undesirable vegetative growth?	No	Yes
H. Other		
1. Are there additional conditions that were observed and noted during the inspection?	No	Yes

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
BUILDING 71 ON-PLANT CONSOLIDATION AREA (OPCA)

POST-CLOSURE INSPECTION FORM

III. Inspection Observations

Describe observations from Column B in Section II. Use additional pages if necessary.

N/A

IV. Inspection Response Actions

Describe response actions to be conducted for each observation noted in Section III above. Use additional pages if necessary.

N/A

V. Prior Inspections

Describe response actions conducted to address prior maintenance needs.

D2. Sideslope erosion was filled with topsoil, regraded, and seeded in conjunction with mid-slope swale construction. Sediment accumulation resulting from erosion along the northern toe of the final cover installed in 2006 was removed and riprap was placed along the toe at the designed locations.

D3. The burrowing animals have been removed from the OPCAs, and their burrow holes have been filled with topsoil and seeded.

D6. The plateau of the final cover installed in 2006 was reseeded.

E2. Sediment accumulation within the perimeter ditch on the south side of the Building 71 OPCA was removed and the ditch was restored to the design depth. Regraded areas were reseeded and lined with temporary erosion control mat.

F2. Tank access covers were repainted.

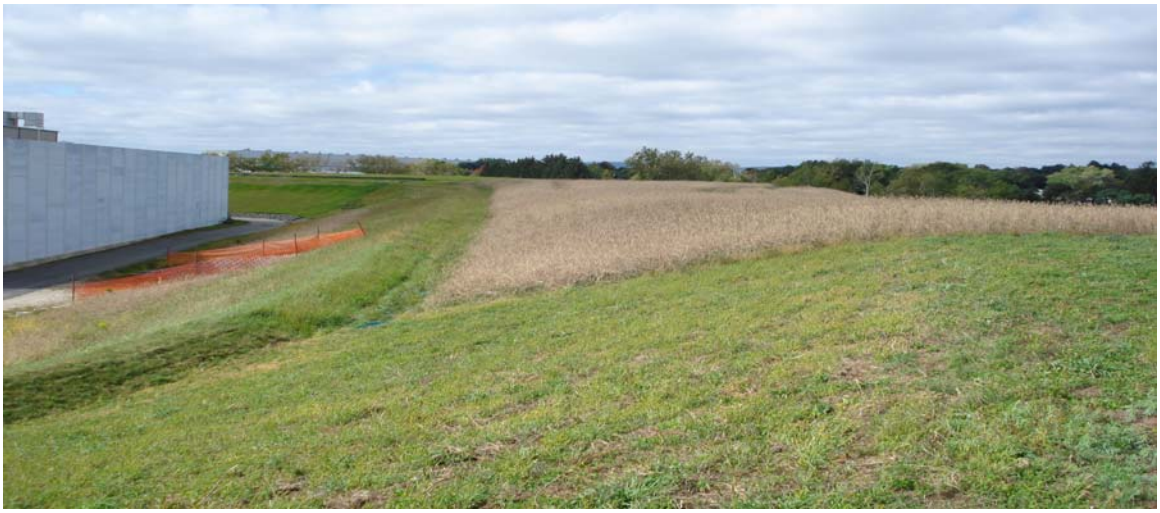
VI. Other Observations

N/A

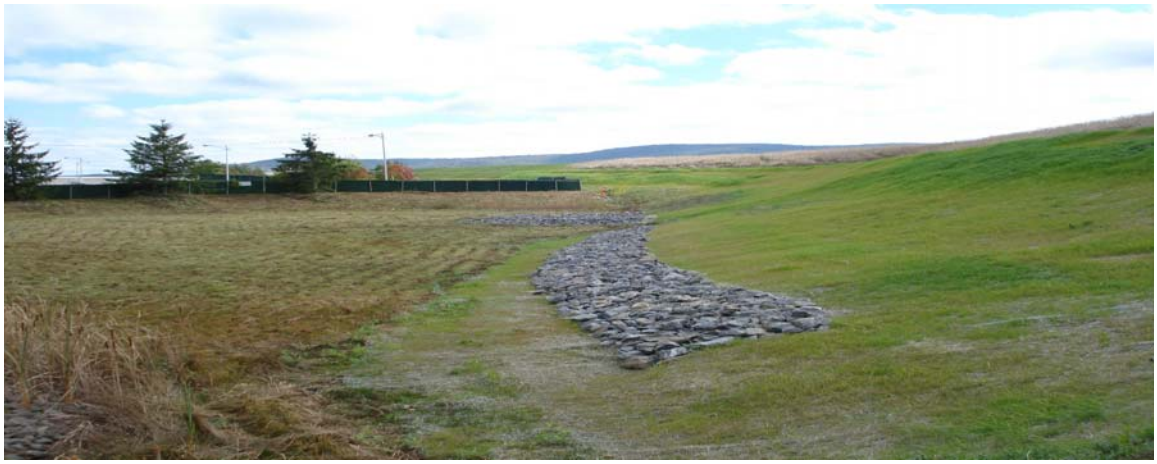
ARCADIS BBL

Attachment 2

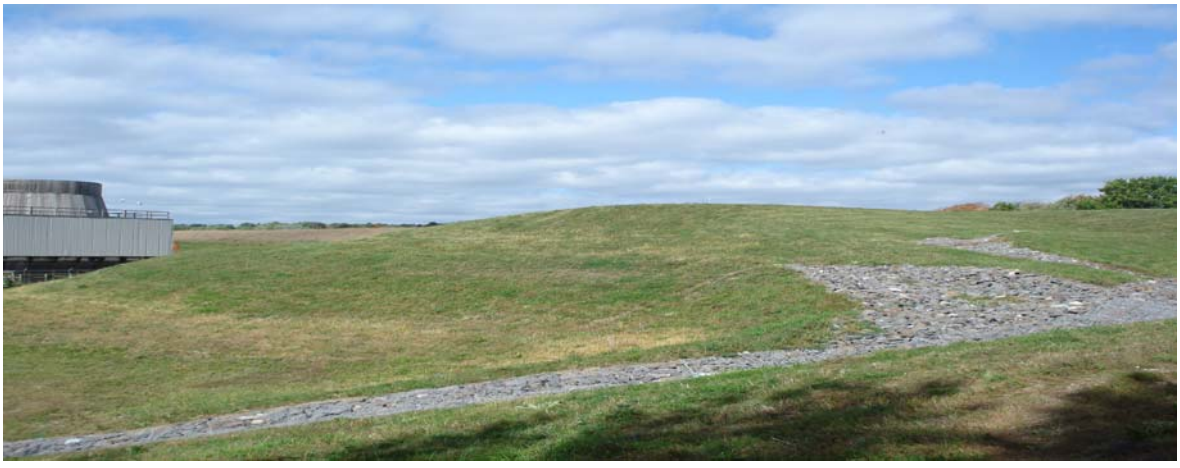
Photographs



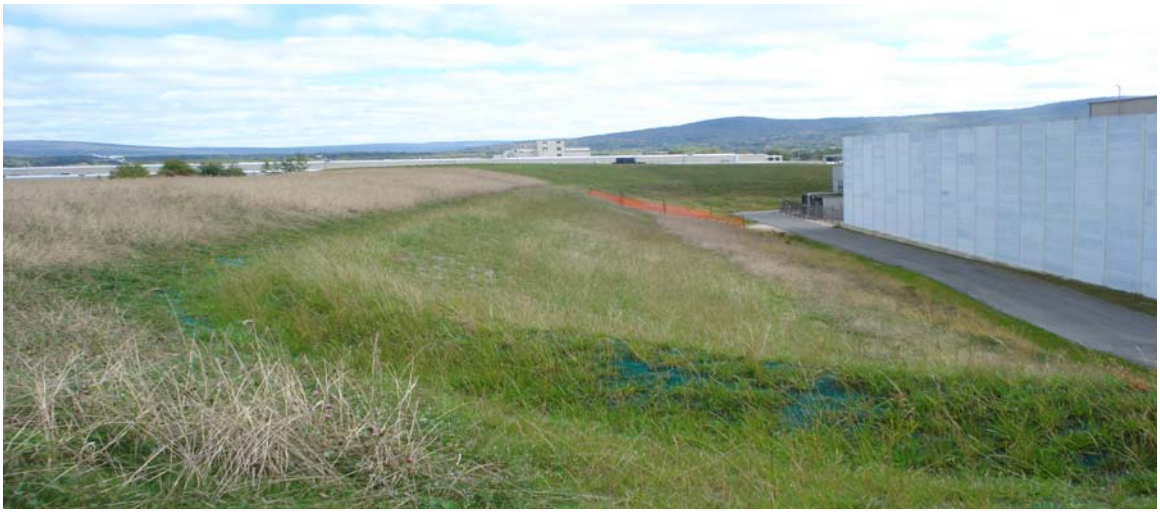
Description: View of Building 71 OPCA southern sideslope (looking west)



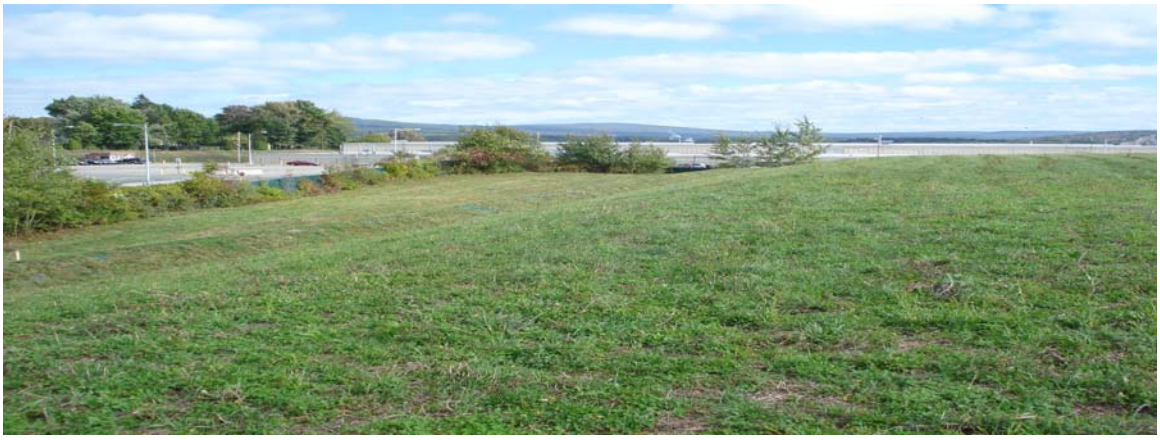
Description: View of Building 71 OPCA northern sideslope and northern sedimentation basin (looking east)



Description: View of Building 71 OPCA southern sideslope (looking northwest)



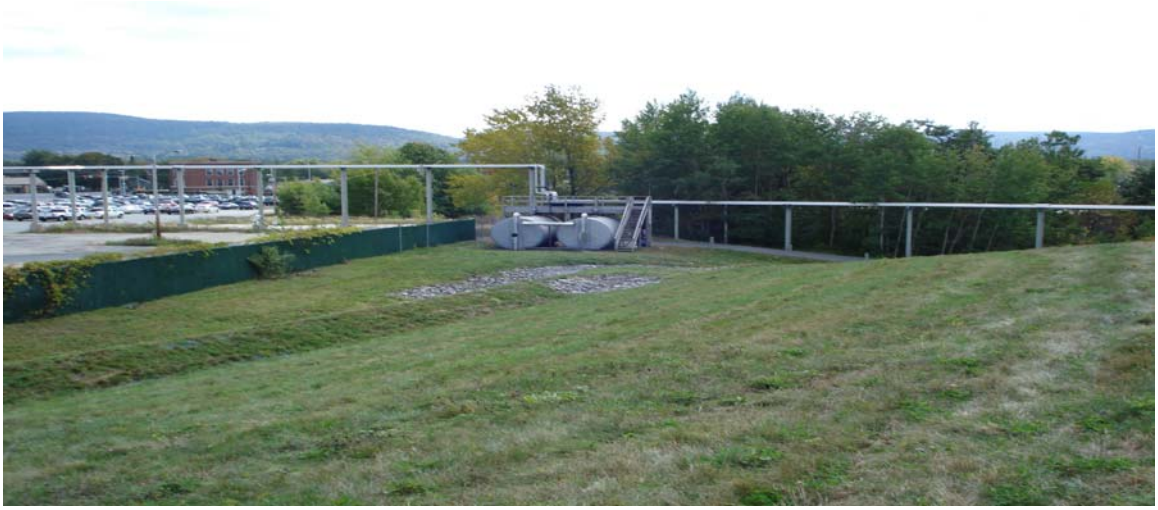
Description: View of Building 71 OPCA southern sideslope (looking east)



Description: View of Building 71 OPCA plateau (looking northeast)

Description: View of Building 71 OPCA northern sideslope and northern sedimentation basin (looking southeast)

Description: View of Building 71 OPCA southwestern sideslope (looking south)



Description: View of Building 71 OPCA southeastern sideslope (looking south)